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Via ECF

Hon. Vincent L. Briccetti
United States District Court
Southern District of New York
300 Quarropas St.
White Plains, New York 10601-4150

1. Mr. Newman is excused from attending the 12/14/15 conference.
2. The request for a settlement conference will be discussed at the 12/14/15 status conference.
3. The Court has not received a voluntary dismissal as to Runco.
4. The Court appreciates the parties' efforts in preparing this status report.

Re: Goldstein, et al. v. Solucorp, et al., Case No. 7:11-cv-06227 (VLB)

Dear Judge Briccetti:

So ordered:
WJm, USDS 12/9/15

We represent plaintiffs Michael Goldstein, Goldstein Group Holdings, Inc., Bernard Kahn, David Weinberg and Raphael Knepler (hereinafter referred to collectively as "Plaintiffs")¹ in this action, and are submitting this Joint Status Letter on behalf of all parties, pursuant to the instruction received from this Court at the Status Conference held on November 18, 2015. (See ECF Doc. 204). All parties have reviewed and join in this letter.

As set forth in greater detail in Plaintiffs' Second Amended Complaint (ECF Doc. 176), this is an action for securities fraud against defendants Solucorp Industries, Ltd. ("Solucorp"), East Morgan Holdings, Inc. ("EMHI"), London Ventures Capital Corp. ("London Ventures"), Michael Reidel ("Reidel"), Richard Runco ("Runco"), Richard Greene ("Greene"), Israel Tyberg ("Tyberg"), Peter Mantia ("Mantia"), and Stephen DeGroat ("DeGroat"), as Commissioner of Finance of Rockland County, as Administrator of the Estate of Joseph Kemprowski ("Kemprowski") (collectively referred to hereinafter as "Defendants").

Plaintiffs allege that the Defendants engaged in a concerted, collective effort to design and execute a fraudulent "pump and dump" scheme by which Defendants artificially inflated (i.e., "pumped"), and otherwise misrepresented the value of Solucorp and its "shell company" EMHI, with the accomplished intent to secure profits by "dumping" the companies' inflated

¹ We no longer represent Jacob Weiss, who was included as a named plaintiff in the original Complaint (see ECF Doc. 1), but has since decided against participating in this action. The docket indicates that his involvement was terminated on March 31, 2015.

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